



PROFESSIONAL AVIATION MAINTENANCE ASSOCIATION

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June 25, 1999

Rules Docket (AGC-10)
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

FAA 99-58369

Reference: 14 CFR Parts, 11, 91, 121, 135, and 145; (Docket No. ~~FAA-1999-5836~~);
Notice 99-09.

This petition is submitted in accordance with FAR 11 Subpart B, §11.25, by the **Professional Aviation Maintenance Association (PAMA)** whose members are most affected by the above referenced NPRM.

Whereas:

The above referenced NPRM states that "Comments must be received on or before October 19, 1999."

Whereas:

This petition is submitted to extend the due date for the submission of comments by approximately 90 days to January 17, 2000.

Discussion:

1. This NPRM affects virtually every aviation maintenance technician and every aviation maintenance business in the United States and many abroad. The NPRM spans 32 pages in the Federal Register and is very complex. The amount of time given by the FAA to review this document is not sufficient for the amount of complexity involved.
2. The lead-time necessary to publish **PAMA** News and other aviation industry publications, which would encourage dialog with mechanics, is such that there is not enough time to disseminate information or engage in necessary discussion.
3. **PAMA** Chapter meetings generally resume in September and October. Additional time is needed for the Chapters to meet, to understand the proposed rule, and to make meaningful comments. As this is written only a small fraction of the of the maintenance technicians are aware that the NPRM is available. In addition, there are several major aviation industry events scheduled in October which would generate further high-quality comments.
4. Sufficient time is needed to evaluate all of the documents to make quality and complete comments.
5. Safety will be enhanced if enough time is given to the public to permit competent comment and thereby remove ambiguity in the proposed rule

that could cause a repair station or firm to perform work for which regulations, qualifications, or training may be in question.

Granting such a 90-day extension of the due date for comments would not inconvenience the government. The high-quality, competent comment that will result from such an extension will help the government issue a better rule.

This NPRM has been under development for more than 10 years. Even people who were familiar with NPRM details at an earlier time must review the **complete** documents in detail to fully understand any interrelationships to changes that may have taken place.

This petition is respectfully submitted in the name of and for the 5,000 members of the **Professional Aviation Maintenance Association** and its 300 member companies,

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Mackiewicz', with a stylized, flowing script.

Stan Mackiewicz
President

cc: Ava Mims, AFS-2
Richard E. Nowak, AFS-330